



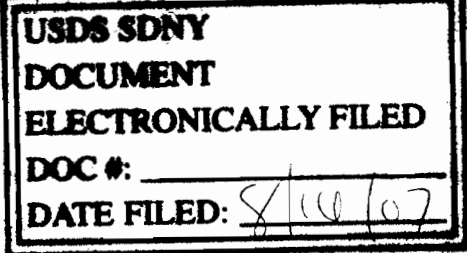
MEMO ENDORSED

THE CITY OF NEW YORK
LAW DEPARTMENT

MICHAEL A. CARDOZO
Corporation Counsel

100 CHURCH STREET
NEW YORK, NY 10007

JOHANA V. CASTRO
Assistant Corporation Counsel
phone: (212) 788-0976
fax: (212) 788-9776
email: jcastro@law.nyc.gov



August 10, 2007

BY HAND

Honorable John G. Koeltl
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

APPLICATION GRANTED.

SO ORDERED.

8-14-07

Kimberly M. Wood
KIMBERLY M. WOOD
PART I

Re: Mangal, et al. v. City of New York, et al., 07 CV 3777 (JGK)

Dear Judge Koeltl:

I am an Assistant Corporation Counsel in the Special Federal Litigation Division of the New York City Law Department assigned to the above-referenced case. I am writing with the consent of plaintiffs' counsel, Glenn Wolther, Esq., to respectfully request a sixty-day enlargement of time, from August 13, 2007 to October 12, 2007 within which the City may answer or otherwise respond to the complaint. If the Court is so inclined to grant this request, it is further respectfully requested that the initial conference currently scheduled for September 20, 2007 at 4:30 PM be adjourned to a later date and time convenient to the Court after issue has been joined.

The complaint alleges, inter alia, that plaintiffs Christopher Mangal and Ewart Burton were falsely arrested and maliciously prosecuted. In addition to the City, plaintiffs purport to name Undercover Police Officer #974 and Police Officer Jennifer Childs as defendants.¹ Before

¹ On information and belief, it does not appear as if service has been effectuated upon the individuals identified in the caption of the complaint as "Undercover Police Officer #974" and "Police Officer Jennifer Childs." Without appearing on their behalf or making any representations with respect to service I also respectfully request that the additional defendants' time to answer or otherwise respond to the complaint also be extended until October 12, 2007.

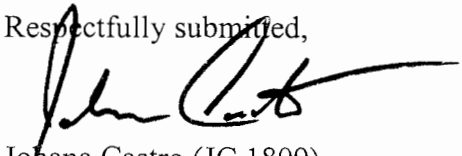
Grant
KMU
Counsel
shall
call
Judge
Koeltl
Chambers
by
9-10-
to re
schedule
the
conference
KMU

this office can adequately respond to the complaint, we will need to conduct an investigation into the facts of the case. To this end, the City will need to obtain releases from plaintiffs to access the underlying arrest and criminal court records regarding this action. The enlargement of time will therefore afford us the opportunity to investigate the matter.

No previous request for an enlargement of time has been made. Accordingly, it is respectfully requested that the City's time to respond to the complaint be extended to October 12, 2007. Additionally, if the Court is so inclined to grant this request, it is further respectfully requested that the initial conference scheduled for September 20, 2007 at 4:30 PM be adjourned to a later date and time convenient to the Court after issue has been joined.

Thank you for your consideration in this regard.

Respectfully submitted,



Johana Castro (JC 1809)
Assistant Corporation Counsel
Special Federal Litigation Division

cc: BY FAX
(212) 964-0763
Glenn A. Wolther, Esq.
Attorney for Plaintiff
305 Broadway, Suite 1102
New York, NY 10007